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June 29, 2016

**BY ECF**

The Honorable Gregory H. Woods  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

RE: Gersbacher v. City of New York, et. al.  
14 cv 7600 (GHW) (KNF)

Your Honor:

I am a Senior Counsel for The City of New York, attorney for defendants in this action. The parties write to provide an update regarding expert discovery per the Court's June 22, 2016 order, docket entry [63].

Counsel has conferred and agreed to a schedule to complete expert discovery, including the deposition of LCSW Carville. Plaintiff has requested additional information regarding the procedures for a proposed medical exam of plaintiff, but subject to review of that information does not object to an exam at this time, and anticipates potentially seeking to have said exam video-recorded. Any medical exam would be held prior to July 29, 2016 to allow plaintiff to take the deposition of defendants' expert by August 12, 2016. The parties anticipate resolving any issues related to expert discovery without the necessity of court intervention.

Respectfully Submitted

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/s/

Andrew Lucas  
Senior Counsel

cc: Wylie M. Stecklow  
Samuel B. Cohen